

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

SUN ZHONGJIAN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ENCORE ENERGY CORP., PAUL
GORANSON, and SHONA WILSON,

Defendants.

Case No. 4:25-cv-01234

Honorable Charles R. Eskridge III

**STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT AND SETTING A BRIEFING SCHEDULE**

This Stipulation and [Proposed] Order is entered into between plaintiff Sun Zhongjian (“Plaintiff”), and defendants enCore Energy Corporation (“enCore Energy”) and Shona Wilson (together, the “Served Defendants” and, with Plaintiff, the “Parties”).

WHEREAS, on March 14, 2025, Plaintiff filed a putative class action complaint alleging securities fraud claims against Defendants enCore Energy, Shona Wilson, and Paul Goranson (the “Complaint”), thereby commencing the above-captioned action (the “Action”);

WHEREAS, Defendant enCore Energy was served with the Complaint on April 2, 2025 (ECF No. 12), and Defendant Shona Wilson, enCore Energy’s current CFO, has agreed to accept service of the Complaint as of the date of this stipulation;

WHEREAS, Defendant Paul Goranson, enCore Energy’s former CEO (the “Unserved Defendant”), has neither appeared nor been served in the Action;

WHEREAS, the Action is governed by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4;

WHEREAS, the PSLRA provides for the Court's appointment of a Lead Plaintiff and Lead Counsel for the putative class after a 60-day notice period following publication of notice of the filing of an initial securities class action (15 U.S.C. § 78u-4(a)(3));

WHEREAS, in accordance with the PSLRA, on March 14, 2025, Plaintiff published notice of the pendency of this Action, which triggered a May 13, 2025, deadline for investors to seek appointment as Lead Plaintiff;

WHEREAS, once appointed, Lead Plaintiff will either deem the Complaint (or the complaint in any similar action that may be filed) to be the operative complaint or file an amended (and/or consolidated) complaint;

WHEREAS, the Served Defendants presently intend to move to dismiss any complaint in this Action, and therefore all discovery and other proceedings are automatically stayed pending the Court's determination of such motion under the PSLRA (15 U.S.C. § 78u-4(b)(3)(B));

WHEREAS, in order to avoid unnecessary expenditure of judicial resources and effort by the Court and the Parties prior to the appointment of Lead Plaintiff, the Parties agree that the deadlines for the Served Defendants to respond or otherwise move with respect to the Complaint or any related complaint filed in this Court should be aligned and extended to follow the Court's appointment of a Lead Plaintiff and Lead Counsel and the filing (if any) of a consolidated or amended complaint;

WHEREAS, no Party has previously requested or received an extension of time to answer or otherwise respond to the Complaint;

NOW, THEREFORE, Plaintiff and the Served Defendants stipulate and agree, subject to the approval of the Court, as follows:

1. Defendant Shona Wilson, through her undersigned counsel, accepts service of the Complaint as of the date of execution of this stipulation, without prejudice and without waiver of any defenses, objections, or arguments in this matter, except as to sufficiency of service of process.

2. Counsel for the Served Defendants do not currently represent, and are not making an appearance on behalf of, the Unserved Defendant, and nothing in this Stipulation shall be construed as an appearance by or on behalf of the Unserved Defendant or as a waiver of any of Unserved Defendant's defenses, including, but not limited to, insufficient service of process or lack of personal jurisdiction.

3. The Served Defendants shall not be required to answer or otherwise respond to, and are hereby expressly relieved from answering or otherwise responding to, the Complaint, or any subsequently filed complaint in this or another similar action, prior to appointment of Lead Plaintiff, following which Defendants' obligations shall be as set forth below:

a. Upon appointment, Lead Plaintiff shall have sixty (60) days to file an amended (and/or consolidated) complaint or to submit a notification to the Court that Lead Plaintiff deems the Complaint (or any complaint subsequently filed herein or in another similar action) the operative complaint.

b. The Served Defendants shall answer, move against or otherwise respond to the operative complaint within sixty (60) days after the filing of (i) any amended (and/or consolidated) complaint, or (ii) Lead Plaintiff's notification that the Complaint (or any subsequently filed complaint in this or another similar action) shall be deemed the operative complaint;

4. If the Served Defendants move to dismiss the operative complaint, Lead Plaintiff shall have sixty (60) days to oppose such motion and the Served Defendants shall have forty-five (45) days thereafter to file their reply in further support of the motion.

5. In light of the Lead Plaintiff process and the automatic stay of discovery under the PSLRA, the Court's Order for Conference and Disclosure of Interested Parties (ECF No. 3), the Court's Scheduling and Docket Control Order (ECF No. 11), and all associated hearings and deadlines are each adjourned *sine die*.

6. In the event the Court declines to approve any provision of this Stipulation, the Parties reserve their respective rights and positions.

DATED: April 17, 2025

/s/ Charles H. Linehan (by approval)

Charles H. Linehan
GLANCY PRONGAY & MURRAY LLP
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: (310) 201-9150
Facsimile: (310) 201-9160

Sammy Ford IV
Davis Metzger
AHMAD, ZAVITSANOS & MENSING,
PLLC
1221 McKinney Street, Suite 2500
Houston, Texas 77010
Telephone: (713) 665-1101
Facsimile: (713) 665-0062
Email: sford@azalaw.com
dmetzger@azalaw.com

Frank R. Cruz
THE LAW OFFICES OF FRANK R.
CRUZ
2121 Avenue of the Stars, Suite 800
Century City, CA 90067
Telephone: (310) 914-5007

Counsel for Plaintiff

/s/ Rex A. Mann

Rex A. Mann
Steven H. Stodghill (pro hac vice forthcoming)
William R. Morris III (pro hac vice
forthcoming)
WINSTON & STRAWN LLP
2121 N. Pearl Street, Suite 900
Dallas, Texas 75201
Telephone: (214) 453-6500
Email: sstodghill@winston.com
rmann@winston.com
wmorris@winston.com

Matthew L. DiRisio (pro hac vice forthcoming)
Kerry C. Donovan (pro hac vice forthcoming)
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166
Telephone: (212) 294-4686
Email: mdirisio@winston.com
kcdonovan@winston.com

*Counsel for Defendants enCore Energy Corp.
and Shona Wilson*

SO ORDERED this ____ day of April, 2025.

The Honorable Charles R. Eskridge III, U.S.D.J.

Certificate of Service

Pursuant to Local Rule 5.3 and Federal Rule of Civil Procedure 5(b), this pleading was submitted to Plaintiff's counsel via email on April 17, 2025. Plaintiff's counsel agrees to the relief sought herein.

Dated: April 17, 2025

/s/ Rex A. Mann

Rex A. Mann